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# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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June 30, 2011

TO: Internal File

THRU: Steve Christensen, Team Lead *GLC*

FROM: April A. Abate, Environmental Scientist III

RE: Permit Boundary Amendment, Sunnyside Cogeneration Associates, Sunnyside Refuse/Slurry, C007/0035, Task #3821

### SUMMARY:

On May 2<sup>nd</sup>, 2011, the Division of Oil, Gas and Mining (the Division) received an amendment to the Sunnyside Refuse and Slurry MRP (SCA) from Sunnyside Cogeneration Associates (the Permittee). The amendment proposes to reduce the SCA permit area by removing approximately 67.9 acres. The geologic maps section does not meet the requirements of R645-301-622. Please resubmit the Plates 6-1 through 6-4 as described below:

**[R645-301-622]:** Plate 6-1 references three cross sections: A-A', B-B' and C-C'. These cross sections are subsequently referred to as Plates 6-4, 6-5 and 6-6, respectively. These cross sections will need to be modified to address the reduction in the permit area.

**[R645-301-622]:** Plate 6-2 – the Hydrogeologic Map will require updating based on the permit boundary change. All geologic maps should be resubmitted in color such that the lithologic symbols are clearly demarcated by the colors each formations represents.

**[R645-301-622]:** There appears to be no existing Plate 6-3 based on the information presented in the Chapter 6 Table of Contents. Unless there is a plate missing from the MRP that needs to be included, please renumber the cross sections as 6-3, 6-4, and 6-5 so that it does not appear that there is a break in the map sequence. Please also resubmit an updated Chapter 6 Table of Contents based on these map changes.

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**TECHNICAL ANALYSIS:**

**ENVIRONMENTAL RESOURCE INFORMATION**

**PERMIT AREA**

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

**Analysis:**

The amendment submitted seeks to reduce the permit area by 67.9 acres. This area encompasses a combination of undisturbed and reclaimed lands. This will essentially require any text and plate updates to the geology section of the MRP. The Geology section of the MRP was reviewed to verify that all sections of the Geology regulations including plates were updated based on the redrawn boundary.

**Findings:**

The permit boundary reduction occurs in the north ½ of Section 7 of T15S, R14E, Salt Lake Base & Meridian. There were no text changes in Chapter 6 that described the permit boundary that required updating. Figures 6-1 through 6-4 were all generalized geologic information for the area (i.e. from text books/published literature). Figure 6-4 was a laboratory sheet depicting a coal sample analysis.

Chapter 6 texts, figures and attachments do not require updating based on this permit boundary change.

**MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

**Analysis:**

**Coal Resource and Geologic Information Maps**

The Permittee submitted Plate 6-1 to depict the reconfigured permit boundary reducing the permit boundary by 67.9 acres. Unlike Plate 1-1, the surface facilities on the map were not included in the permit boundary. Plate 6-1 references cross sections A-A', B-B' and C-C'.

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These cross sections are subsequently referred to as Plates 6-4, 6-5 and 6-6, respectively. These cross sections will need to be modified to address the reduction in the permit area.

For example, the length of the permit area shown on Plate 6-1 is a distance of 2,320 feet (based on the scale of the map listed as 1"= 200 feet). The corresponding cross section A-A' (Plate A-A') measures the permit boundary at 3,540 feet (based on the horizontal scale on the map as 1"= 400 feet). The horizontal distances of the permit area shown on cross sections B-B' and C-C' will also need to be adjusted to account for the reduced distances.

Plate 6-2 – the Hydrogeologic Map will also require updating since the permit boundary was not changed. Furthermore, all geologic maps should be resubmitted in color such that the lithologic symbols are clearly demarcated by the colors each formations represents.

Lastly, there appears to be no existing Plate 6-3 based on the information presented in the Chapter 6 Table of Contents. Unless there is a plate missing from the MRP, please renumber the cross sections as 6-3, 6-4, and 6-5 so that it does not appear that there is a break in the map sequence and resubmit an updated Chapter 6 Table of Contents.

**Findings:**

The geologic maps section does not meet the requirements of R645-301-622. Please resubmit the Plates 6-1 through 6-4 as described above.

**RECOMMENDATIONS:**

Approval for Task #3821 is not recommended at this time.